

*danielle kupperman*

47 Crescent Road  
Livingston, NJ 07039

danikup@hotmail.com  
973.809.4599

June 4, 2025

RE: Case no.: 25-13415-SLM  
Chapter 13  
Hearing date June 11, 2025

U.S. BANKRUPTCY COURT  
FILED  
NEWARK, NJ  
2025 JUN -9 P 2:39  
JEANNE A. NAUGHTON  
CLERK  
BY *D. Kupperman*

Dear Honorable Stacey Meisel,

Please find attached the Objection to Confirmation of Chapter 13 Plan for above referenced case, along with the accompanying certification and supporting documentation. These documents will also be filed through the Court's electronic filing system.

Should you require any additional information or have any questions, please do not hesitate to contact me at (973) 809-4599.

Thank you,



Danielle Kupperman

I certify that the attached documents were sent to:

Melinda Middlebrooks, Attorney for Debtor, via certified mail and email

Marie-Ann Greenberg, Chapter 13 Standing Trustee, via email

Juliana Diamond, Law Clerk of Honorable Stacey Meisel, via email

Amanda Simone, Law Clerk of Honorable Stacey Meisel, via email

Jeanne Naughton, Clerk, US bankruptcy Court, via mail

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:  
Todd Schragen, Debtor

Case No. 25-13415-SLM  
Chapter 13  
Judge Stacey L. Meisel

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

Creditor, Danielle Kupperman, respectfully objects to confirmation of the Chapter 13 Plan filed by Debtor, Todd Schragen, pursuant to the following:


1. The Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on April 1, 2025.
2. The Debtor's schedules and Chapter 13 Plan state that the Debtor owes zero dollars (\$0) in domestic support obligations ("DSOs").
3. Contrary to the Debtor's representations, the Debtor owes the Creditor domestic support obligations in the amount of Seven Thousand Seven Hundred Forty-Five Dollars and Six Cents (\$7,745.06).
4. This domestic support obligation qualifies as a priority claim under 11 U.S.C. § 507(a)(1)(A) and a domestic support obligation as defined under 11 U.S.C. § 101(14A).
5. Pursuant to 11 U.S.C. § 1325(a)(8), a Chapter 13 Plan cannot be confirmed unless all domestic support obligations owing at the time of confirmation are paid in full.
6. In addition, the Debtor's failure to disclose and provide for the outstanding domestic support obligation violates the requirements of Federal Rule of Bankruptcy Procedure 1007(b)(6) and Local Bankruptcy Rule 3015-1(c), which require accurate disclosure of priority claims and that the Chapter 13 Plan provide for their full payment.

7. The Debtor's omission renders the Plan noncompliant with the Bankruptcy Code and the Local Rules of this Court, making it ineligible for confirmation.
8. The Debtor must amend the Chapter 13 Plan to provide for full payment of the domestic support obligation of \$7,745.06, or confirmation must be denied.

Creditor respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan unless and until it is amended to provide for full payment of the domestic support obligation in the amount of \$7,745.06, and for such other relief as the Court deems just and proper.

Dated: June 4, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dan K', with a stylized flourish at the end.

Danielle Kupperman

47 Crescent Road, Livingston, NJ 07039  
973.809.4599  
danikup@hotmail.com

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:  
Todd Schragen, Debtor

Case No. 25-13415-SLM  
Chapter 13  
Judge Stacey L. Meisel

**CERTIFICATION IN SUPPORT OF  
OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

1. I am a creditor in the above-captioned bankruptcy case and the party to whom the Debtor, Todd Schragen, owes domestic support obligations.
2. On May 9, 2025, a court order was entered establishing domestic support obligations payable by the Debtor to me in the amount of \$7,745.06. This court order was an enforcement for violation of previously entered court orders dated May 30, 2024 and October 25, 2024.
3. The Debtor filed for relief under Chapter 13 on April 1, 2025 and filed schedules and a Chapter 13 Plan that inaccurately represent that the Debtor owes no domestic support obligations.
4. As of the date of this certification, the Debtor remains indebted to me in the amount of Seven Thousand Seven Hundred Forty Five Dollars and Six cents (\$7,745.06) for unpaid domestic support obligations; arrears accumulated since 2022.
5. I have reviewed and included the relevant records, such as Court Order dated May 9, 2025 (which enforced prior Court Orders) and a current statement from NJ Child Support Probation Division, and confirm that this amount remains outstanding.
6. Pursuant to 11 U.S.C. § 1325(a)(8), this domestic support obligation must be paid in full under any confirmed Chapter 13 Plan.

7. The Debtor's failure to disclose this debt in the bankruptcy filings renders the Plan noncompliant and unconfirmable unless amended to provide for full payment of the obligation.

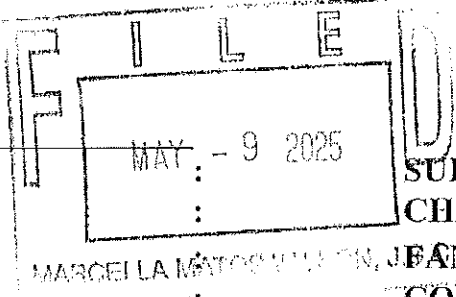
I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 4, 2025

A handwritten signature in black ink, appearing to read 'DK', with a stylized, flowing script.

Danielle Kupperman

*Prepared by the Court*



**Todd Schragen,**

**Plaintiff,**

**v.**

**Danielle Kupperman,**

**Defendant.**

**Docket No. FM-07-770-15  
Civil Action**

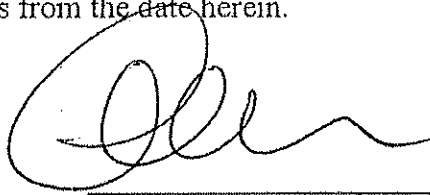
**ORDER**

**THIS MATTER**, having been brought to the attention of the Court by way of a Notice of Motion filed by Defendant, Danielle Kupperman, self-represented, on notice to with no opposition filed by Plaintiff, Todd Schragen, self-represented, and the Court having considered the arguments of the parties, and for the reasons set forth in the attached Statement of Reasons, and for good cause having been shown:

It is on this 9<sup>th</sup> day of **May 2025 ORDERED** as follows:

1. Plaintiff is hereby found to be in violation of Litigant's Rights with respect to Paragraph 1 of this Court's Order, dated October 25, 2024, and Paragraphs 8 and 9 of this Court's May 30, 2024, Order, for failure to render payment in the total amount of \$4,559.06, which represents Plaintiff's 50% share of the children's unreimbursed medical and extracurricular expenses incurred from January 2022 through March 2024.
2. Plaintiff is hereby found to be in violation of Litigant's Rights with respect to the Parties' December 2020 Consent Order for failure to render payment in the total amount of \$3,186.00, which represents Plaintiff's 50% share of the children's unreimbursed medical and extracurricular expenses incurred from April 2024 through December 2024.
3. The total amount of \$7,745.06 shall be added to Plaintiff's child support arrears. The Essex County Probation Department shall adjust its records accordingly. (CS91288016).
4. Any and all arrears shall be paid at a rate of \$100.00 per week until all arrears are satisfied in full.

**AND IT IS HEREBY ORDERED** that a copy of this Order shall be served upon all interested parties within seven (7) days from the date herein.

A handwritten signature in black ink, appearing to be 'M. Matos Wilson', written over a horizontal line.

**HON. MARCELLA MATOS WILSON, J.S.C.**

☐ Opposed ☒ Unopposed

Click the link in the sidebar menu to view that section's details.

#### Case ID

CS91288016A

#### Case Details

Member ID: 91288016

Case Type: IV-D

Relationship to Case: Custodial

Custodial Parent: SCHRAGEN

Parent

DANIELLE

Case Status: Open

Non-Custodial Parent: SCHRAGEN

TODD

#### DETAIL SECTIONS

Dependents

Obligation & Arrears Details

Intergov Case Details

Schedule Details

Genetic Test Results

Enforcement Details

CP Financial Details

Disbursements to CP

Yearly Totals

Case Documents

Resources

#### FORMS

End of Year Statement

#### Obligation & Arrears Details

PRINT

EXPORT

|   |                  |
|---|------------------|
| Monthly Support Obligation                              | \$537.00         |
| Total Paid for the Current Month                        | \$0.00           |
| Total Amount of Arrears Collected for the Prior Month ⓘ | \$0.00           |
| Current Balance Due ⓘ                                   | \$8,252.06       |
| Party Responsible for Providing Insurance               | CUSTODIAL PERSON |
| Arrears Payback Amount                                  | \$100.00         |
| Arrears Payback Frequency                               | WEEKLY           |
| Arrears Payback Effective Date                          | 5/9/2025         |

#### Obligation & Arrears Details

| Debt Type     | Obligation Amount | Frequency | Next Charge Date | Effective Date |
|---------------|-------------------|-----------|------------------|----------------|
| CHILD SUPPORT | \$537.00          | MONTHLY   | 7/1/2025         | 7/1/2023       |



